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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

*People of the State of California, et al. v. Meta
Platforms, Inc., et al.*

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

4:23-cv-05448-YGR

**OMNIBUS STIPULATION REGARDING
SEALING JOINT LETTER BRIEF ON
META'S RESPONSE TO STATE
ATTORNEYS GENERALS' REQUEST
FOR PRODUCTION NUMBER 102**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5 and this Court's Order Setting Sealing Procedures (Dkt. 341), Plaintiffs and the Meta Defendants submit this Omnibus Stipulation to Seal in connection with the Parties' Joint Letter Brief on Meta's Response to State Attorneys Generals' Request For Production Number 102 (Dkt. 1773) and Meta's administrative motion to file under seal (Dkt. 1774).

At this time, Plaintiffs do not oppose Meta's request to seal the declarant's name in Dkt. 1774-4 and reserve all rights to challenge designations and sealing in the future. The Parties agree that the filings otherwise need not be maintained under seal. Accordingly, the Parties stipulate to the following chart:

Filing	Portion to be Sealed	Basis for Sealing
Declaration in Support of Joint Letter Brief on Meta's Response to State Attorneys Generals' Request For Production Number 102 (ECF 1774-4)	Declarant's Name	<p>There is good cause to seal the declarant's name to protect their privacy interests at this time. <i>See, e.g., Murphy v. Kavo Am. Corp.</i>, 2012 WL 1497489, at *1 (N.D. Cal. Apr. 27, 2012) (granting motion to seal "employee-identifying information" because "[e]mployees and former employees who are not parties to this litigation have privacy interests in their personnel information, and in other sensitive identifying information") (Gonzalez Rogers, J.); <i>see also, e.g., Am. Auto. Ass'n of N. California, Nevada & Utah v. Gen. Motors LLC</i>, 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019); <i>Opperman v. Path, Inc.</i>, 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); <i>Hunt v. Cont'l Cas. Co.</i>, 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015). Sealing this name is also consistent with the approach the Court took in sealing names of Meta employees in the Personal Injury Plaintiffs' Master Complaint and the multistate Attorney General Complaint. <i>See</i> Dkt. 189; Case No. 4:23-cv-05448-YGR, Dkt. 77. Sealing this name is further warranted to protect the employee's safety, as explained in the accompanying Declaration of Andre Suite. <i>Cf. Campbell v. Grounds</i> 2022 WL 14151744, at *1 (N.D. Cal. Oct. 24, 2022) (sealing witness name and finding standard met when disclosure "could put at risk the safety of one or more individuals if made public").</p> <p>No party has previously sought to seal this information.</p>

Pursuant to this case's sealing procedures, a Proposed Order implementing this stipulation and a copy of the joint letter brief and declaration with only the redactions listed above are attached.

IT IS SO STIPULATED AND AGREED.

1 DATED: April 8, 2025

Respectfully submitted,

2 **COVINGTON & BURLING LLP**

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FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I, Ashley M. Simonsen, hereby attest that concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: April 8, 2025

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen